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Attorneys for Plaintiffs  
Moonbug Entertainment Limited and  
Treasure Studio, Inc.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MOONBUG ENTERTAINMENT  
LIMITED and TREASURE STUDIO, INC.,

Plaintiffs,

v.

BABYBUS CO., LTD and BABYBUS  
(FUJIAN) NETWORK TECHNOLOGY  
CO., LTD,

Defendants.

Case No: 3:21-cv-06536-EMC

**DECLARATION OF ALFRED CHUBB**

1 I, Alfred Chubb, hereby declare as follows:

2 1. I am the Vice President of Corporate Development for Moonbug Entertainment  
3 Limited ("Moonbug"). I have personal knowledge of the facts set forth in this declaration, and if  
4 called to testify, I could and would testify competently and under oath to the same.

5 2. I led Moonbug's acquisition of CoComelon in 2020. CoComelon is an award-  
6 winning animation show made for a preschool audience and is one of the most popular preschool  
7 series in the world. CoComelon's YouTube channel currently has approximately 149 million  
8 subscribers and is not only the most watched channel on the platform in the United States, but  
9 the second-most watched channel on YouTube in the world, and the most watched children's  
10 channel on YouTube in the world. The series is also available across a number of different  
11 platforms and streaming services, including Netflix, Cartoon Network, Roku, Hulu, Peacock,  
12 AppleTV and Amazon. CoComelon episodes feature a loveable cast of characters led by baby  
13 "JJ" and his supportive and cheerful family, composed of JJ's mother, father, older sister, older  
14 brother, and their dog named "Bingo."


15 3. I also write concerning an intercompany agreement, dated May 21, 2021, between  
16 Moonbug and Treasure Studio, Inc. (the "Intercompany Agreement"), which was produced in  
17 this litigation as MB277632. MB277632 is marked Highly Confidential – Attorneys' Eyes Only  
18 pursuant to the parties' stipulated protective order because it contains confidential and sensitive  
19 business information which cannot be protected through less restrictive means.

20 4. Recognizing the need for confidentiality of this agreement, the parties included  
21 language in it that stated: "The terms of this Agreement are private and confidential between the  
22 Parties and should not be disclosed to any third party (other than each Party's professional  
23 advisers), without the consent of the other Party."

24 5. The Intercompany Agreement contains Moonbug's confidential information  
25 regarding Moonbug's acquisition techniques and business practices, which Moonbug vigorously  
26 protects from public disclosure. Moonbug views this information as confidential and sensitive,  
27 has not made it public, and the disclosure of this information is likely to result in a competitive  
28 or commercial disadvantage to Moonbug. Further, the business decisions expressed in the

1 Intercompany Agreement reflect the confidential research and business strategies of Moonbug.  
2 If this document were to be made public, Moonbug's competitors are likely to use this  
3 information to gain a competitive advantage over Moonbug, including because they are likely to  
4 gain insight into Moonbug's commercial strategies. Disclosure of this agreement would also  
5 undermine Moonbug's bargaining position in future acquisitions of content creators. There is no  
6 less restrictive means to protect this document, other than by sealing, because its disclosure  
7 would create the business risks outlined above.

8 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
9 December 8, 2022 in London, England.

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12 Alfred Chubb  
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